

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States Courts
Southern District of Texas
FILED

NOV 06 2018

United States of America
v.
Clifford Laverne MECHAM

David J. Bradley, Clerk of Court

Case No. C-18-4940M

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 6, 2018 in the county of Nueces in the
Southern District of Texas, the defendant(s) violated:

Code Section

18 USC 2252A (a)(5)(B)

Offense Description

Any person who knowingly possesses, or knowingly accesses with intent to view, any book, magazine, periodical, film, videotape, computer disk, or any other material that contains an image of child pornography that has been mailed, or shipped or transported using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce by any means, including by computer, or that was produced using materials that have been mailed, or shipped or transported in or affecting interstate or foreign commerce by any means, including computer

This criminal complaint is based on these facts:

See attached document titled, "AFFIDAVIT"

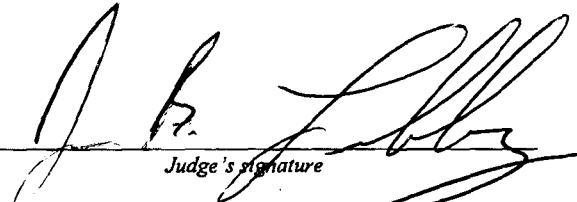
☒ Continued on the attached sheet.


Complainant's signature

Michael A. Monahan, HSI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 11/06/2018


Judge's signature

City and state: Corpus Christi, Texas

Jason B. Libby, United States Magistrate Judge

Printed name and title

AFFIDAVIT

I am a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations (HSI), currently assigned to the Assistant Special Agent in Charge office in Corpus Christi, Texas. I have been employed in this agency since July of 2009, and my responsibilities include investigating criminal violations related to offenses committed against the United States including but not limited to, child exploitation and child pornography, including violations pertaining to the illegal production, distribution, receipt, and possession of child pornography in violation of Title 18, United States Code, § 2252A(a)(2). I have also received training in the area of child exploitation and child pornography with regard to violations of Title 18 United States Codes Sections 2252, 2252A, and 2242.

I am familiar with the information contained in this affidavit based upon the investigation I have conducted and based on my conversations with other law enforcement officers involved in this investigation, or who have engaged in numerous investigations involving child sexual exploitation.

The facts in this affidavit come from my personal observations, my training and experience and information obtained from other officers, agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the criminal charges being described below in this matter. Based on my training, experience, and the facts set forth in this affidavit, there is probable cause to believe that violations of 18 United States Code 2252 (Possession of Child Pornography) have been committed by Clifford Laverne MECHAM.

18 USCA § 2256 (8)(C) defines child pornography. It states; "child pornography" means any visual depiction, including any photograph, film, video, picture, or computer or computer-generated image or picture, whether made or produced by electronic, mechanical, or other means, of sexually explicit conduct, where-- such visual depiction has been created, adapted, or modified to appear that an identifiable minor is engaging in sexually explicit conduct.

18 USCA § 2256 (9) further defines identifiable minor, as used in section (8)(C). It states; "identifiable minor"-- means a person-- who was a minor at the time the visual depiction was created, adapted, or modified; or whose image as a minor was used in creating, adapting, or modifying the visual depiction; and who is recognizable as an actual person by the person's face, likeness, or other distinguishing characteristic, such as a unique birthmark or other recognizable feature; and shall not be construed to require proof of the actual identity of the identifiable minor.

PROBABLE CAUSE

On August 6, 2018, detectives with the Corpus Christi Police Department (CCPD) Internet Crimes Against Children (ICAC) Unit interviewed a computer repair/networking technician regarding suspicious pornographic files found during the troubleshooting and repair of a Hewlett Packard (HP) Pavilion desktop computer dropped off to him by Clifford Laverne MECHAM (hereinafter MECHAM). The technician reported that he observed hundreds of images featuring the nude bodies of adult women morphed with images of the faces of children.

Among the images viewed by the technician, one file featured what appears to be an image of a young female child's face from another photo file morphed onto a child's body clothed only in panties or underwear masturbating a large penis image morphed onto an image of an adult male person with

MECHAM's face morphed over the face of the adult male person. The identity of this child victim has been confirmed, and it has been confirmed that the child was five (5) years of age at the time the facial image was taken and is currently nine (9) years of age.

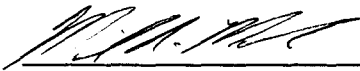
On September 12, 2018, CCPD ICAC Detectives and HSI Corpus Christi Special Agents executed a search warrant at MECHAM's residence. It was determined that MECHAM was the sole occupant and tenant of the residence. MECHAM agreed to be transported to the CCPD ICAC office for an interview. In conclusion of the search warrant, a total of 5 electronic devices and several items of storage media were seized for forensic analysis.

MECHAM was interviewed at the CCPD ICAC office and gave a statement after he had been advised of his rights. During the interview, MECHAM confessed that he produced child pornography by creating computer-generated images and videos wherein photographic images of the faces of children were superimposed onto the bodies of nude adults engaged in sexually oriented poses and sexual acts. When agents explained to MECHAM what "morphing" is, and that this activity fits the description of morphing, MECHAM replied that he guesses that's what he does [morphing child pornography]. Some of the images of the children were animated by MECHAM so that the children appear to be gazing in amazement, masturbating, and/or fellating a cropped image of a large penis morphed onto MECHAM's body, or a different adult body with an image of MECHAM's head superimposed over its head. MECHAM also admitted to creating several computer-generated images featuring an image of one of the children when she was at the age of five (5) years and wearing only panties to make it appear as if the child is touching and/or fellating the same cropped image of a large penis morphed onto his [MECHAM's] body. MECHAM stated that he saves the morphed images and videos that he creates to folders labeled with each of the children's names on his HP Pavilion computer. MECHAM stated that he obtained the adult pornographic images and videos from adult pornographic websites. MECHAM also acknowledged that he is aware of who the children are and that the children were minors in the source images.

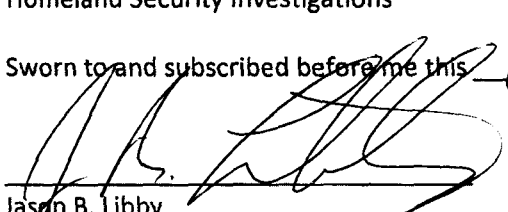
On September 28, 2018, a CCPD ICAC Computer Forensic Specialist prepared a report on the findings of the forensic analysis of the devices and storage media items seized from MECHAM on September 12, 2018. A total of 33,303 child pornography files were found among seven devices. The 33,303 files include 1,741 videos and 31,562 images consisting of a morphing of facial images of two 16-year-old female children, one 10-year-old female child, and one 5-year-old female child onto nude adult female bodies engaged in various forms of sexual activity with nude or partially clothed adult male bodies upon which is morphed a large penis image and/or superimposed image of MECHAM's face.

An 8 minute, 43 second video file titled **scren-laney.wmv** was found on an 8GB SanDisk flash drive seized from MECHAM. This video file featured an adult female actor's body engaged in various oral, vaginal, and anal sexual acts with the face of the aforementioned female child identified as age five (5) in source photos morphed over the face of the adult female actor. In some segments of the video file, MECHAM's face is morphed over the face of a nude male actor participating in the sexual acts.

MECHAM admittedly created and possessed all of the morphed child pornography files on his HP Pavilion desktop computer. The country of origin of this HP Pavilion p6823w desktop computer bearing S/N: 4CD1181NBD containing a 1TB Seagate ST31000528AS hard drive bearing S/N 5VP8XBDL is China.


Michael A. Monahan, Special Agent
Homeland Security Investigations

Sworn to and subscribed before me this 6 day of November, 2018.


Jason B. Libby
United States Magistrate Judge